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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 KEITH PAUL, an Individual,
9
Plaintiff,

10 vs.

11 CITY OF HENDERSON, DOES I -X; ROE
12 CORPORATIONS I -X,
13 Defendant.

CASE NO.: 2:19-cv-00996-GMN-CWH

STIPULATION AND ORDER FOR
PLAINTIFF TO FILE AN
AMENDED COMPLAINT

(First Request)

14 IT IS HEREBY STIPULATED by and between the parties hereto through their
15 respective attorneys that Plaintiff Keith Paul may file a First Amended Complaint
16 revising the current causes of action. The filing of said First Amended Complaint would
17 resolve many of the issues discussed in Defendant City of Henderson's Motion to
18 Dismiss (Doc. No. 12).

19 1. On July 18, 2019, City of Henderson filed a Motion to Dismiss (Doc. No. 12).

20 Under the parties' Stipulation and Order to Extend Time to Answer or Otherwise
21 Respond to Complaint and to Establish Briefing Schedule (Doc. No. 7),
22 Plaintiff's Opposition to the Motion to Dismiss is due August 12, 2019 and the
23 City of Henderson's Reply is due August 26, 2019.
24

1 2. On July 30, 2019, Jenny L. Foley and Marta D. Kurshumova, counsel for
2 Plaintiff, conferred with Brian R. Reeve and Kristina Gilmore, counsel for
3 Defendant City of Henderson, regarding the timing of Plaintiff's Opposition and
4 the City of Henderson's Reply. Counsel for the parties agreed that:

- 5 a. Instead of filing an opposition to Defendant's Motion to Dismiss, Plaintiff
6 would file an amended complaint;
- 7 b. Said amended complaint would resolve many of the issues raised by
8 Defendant's Motion to Dismiss;
- 9 c. Plaintiff has until August 12, 2019, to file an amended complaint; and
- 10 d. Defendant City of Henderson will have until August 26, 2019 to answer
11 or otherwise respond to the First Amended Complaint.
12

13 This document is being electronically filed through the Court's ECF System. In
14 this regard, counsel for Plaintiff hereby attests that (1) the content of this document is
15 acceptable to all persons required to sign the document; (2) Defendant's counsel has
16 concurred with the filing of this document; and (3) a record supporting this concurrence
17 is available for inspection or production if so ordered.
18
19
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21
22
23
24

1 Dated: August 1, 2019

2 CITY OF HENDERSON

3 By: /s/ Brian Reeve
4 BRIAN R. REEVE (# 10197)
5 Assistant City Attorney
6 240 Water Street, MSC 144
7 Henderson, Nevada 89015
8 Telephone: (702) 267-1231
9 Facsimile: (702) 267-1201
10 Email: brian.reeve@cityofhenderson.com

11 *Attorney for Defendant*
12 *City of Henderson*

13 Dated: August 1, 2019

14 HKM EMPLOYMENT ATTORNEYS LLP

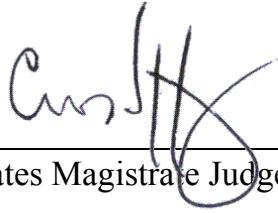
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24 *Attorneys for Plaintiff*
Keith Paul

ORDER

IT IS SO ORDERED:

25 Dated: August 2, 2019, 2019

26 
United States Magistrate Judge